

GREEN KAMINER MIN & ROCKMORE LLP

Manhattan

420 Lexington Ave., Ste 2821
New York, New York 10170
T.212.681.6400

Long Island

600 Old Country Rd., Ste. 410
Garden City, New York 11530
T. 516.858.2115

February 13, 2025

Via ECF

Honorable Carol Bagley Amon
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom 10D South
Brooklyn, New York 11201

Re: *Tatari v. Durust*
Case No. 1:24-cv-06930-CBA-SJB

Dear Judge Amon:

On February 13, 2025, this Court issued an Order regarding the release of the Child's passports (Notice of Electronic Filing, dated February 13, 2025). In part, this Court ordered that on February 18, 2025, the Clerk of Court shall release O.T.'s American passport to Petitioner and O.T.'s Turkish passport to Respondent, and that upon boarding the plane, Petitioner shall transfer the American passport to Respondent. *Id.*

Respondent respectfully requests a modification to the above terms such that he does not have to turn the American passport over to Petitioner until the parties and the Child have passed through customs in Turkey. Petitioner is concerned that there is a significant risk of Respondent absconding with the Child during a layover if the American passport is turned over to her upon boarding the plane in New York. This concern stems from the fact that there are many more countries an individual can enter on an American passport versus a Turkish passport - including non-Hague countries, which would leave Petitioner with no remedy to return the Child to Turkey.

Respectfully,

/s/Richard Min
Richard Min
Attorney for Petitioner

cc: All Counsel (by ECF)